



February 22, 2012

## **COMMENTS ON NATIONAL OCEAN POLICY IMPLEMENTATION PLAN**

### **SUMMARY**

**1. Living marine resources, fisheries and marine aquaculture should be given a central strategic priority in the National Ocean Policy Implementation plan.** These resources and industries are uniquely vulnerable to changes in conditions and resiliency of the ocean; without the oceans, they do not exist. They should be our foremost priority, not merely equated with other competing ocean uses and users. Equal priorities means no priorities.

**2. Living marine resources, fisheries and marine aquaculture provide substantial and irreplaceable benefits** because they generate sustainable jobs in the U.S. and abroad, promote stability in international affairs, provide an efficient, secure and healthy food supply, and preserve social and cultural heritage.

**3. The draft Implementation Plan should be revised** to include an independent section on sustainable living marine resources, fisheries and aquaculture, right after the statement of the national priority objectives, to emphasize their priority. In addition, MAFAC's previous comments (June 29, 2011) should be revisited.

The Marine Fisheries Advisory Committee (MAFAC) advises the Secretary of Commerce on matters related to living marine resources. MAFAC supports the need for a national vision for the oceans. However, the draft National Ocean Policy Implementation Plan does not adequately prioritize sustainability of living marine resources, fisheries and aquaculture, and the jobs that depend upon them. The oceans are the habitat for all marine resources. The oceans are the fisheries. Marine aquaculture depends on the ocean.

As currently written, the National Ocean Policy Implementation Plan gives relatively equal weight to all competing uses. Yet marine resources, fisheries and marine aquaculture exclusively depend upon and have no substitute for the ocean, and remain uniquely vulnerable to the changes in the conditions and resiliency of the ocean. Without the oceans, they do not exist. In contrast, other competing sectors, such as oil and gas and renewable energy in the ocean, have land-based substitutes. If our national policy goal for the oceans is truly to achieve sustainability, then this document should be revised to state, as a foremost priority, that all other uses and users in the ocean must remain fully compatible with living marine resources, fisheries and aquaculture.

Objective consideration of our past, present and future inescapably shows that living marine resources, and the fisheries and aquaculture industries that depend upon them, should be the top priority in our vision for the oceans. For centuries, fisheries have served as foundational

employers in many coastal communities, shaping the culture and traditions of American citizens and indigenous Tribes. Even today, commercial and recreational businesses based on marine resources, fisheries and aquaculture are often the sole economic prospect in small coastal communities.

Internationally, these industries represent enormous portions of the economy in many growing nations. Fisheries policy even has consequences for international relations and nation building, with fishing rights and treaties influencing the success or failure of many nations' economy, health and stability.

Fisheries and aquaculture also offer solutions for a sustainable future. In public health policy, these industries serve as energy-smart sources of new food supplies, presenting an alternative to pollution- and carbon-intensive livestock and agriculture. In addition, promotion of healthy fish protein choices will contribute to improved human health, and the highly efficient aquaculture industry can become an essential tool to achieve global food security.

Given the prospect of preparing a document that would be acceptable to all federal agencies with any kind of stake in the ocean, it is understandable that many uses and users of the ocean have been given equal weight and priority in the draft Implementation plan. But as a consequence, the scale and scope of objectives and strategies in the document remain large and abstract. The lack of strategic prioritization is likely to result in a paralysis of inaction that ensures the status quo. A document with many equal priorities really has no priorities.

To achieve greater strategic clarity, the Implementation Plan could be changed right after the statement of the national priority objectives, giving healthy living marine resources their own, independent section in the plan to reflect their priority. Additional details of how fisheries and aquaculture concepts intersect with the original nine priority objectives of the national policy were outlined by MAFAC in previous comments submitted electronically to CEQ on June 29, 2011. MAFAC also recommends those comments be re-evaluated.

In conclusion, MAFAC commends the authors of the National Ocean Policy on the extraordinary investment of time and effort into the creation of the National Ocean Policy, and the draft Implementation Plan. However, to enable meaningful implementation of these documents, and to provide guidance to all other uses and users about the priorities in our oceans, MAFAC recommends that living marine resources, fisheries and aquaculture be given an independent section within the plan, and a central strategic priority.